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2 Law Offices of William F. Marini  
3 1330 East 14<sup>th</sup> Street  
4 San Leandro, CA 94577  
5 (510) 483-5532

6 Attorney for Plaintiffs

7 UNITED STATES DISTRICT COURT  
8 OF NORTHERN CALIFORNIA

9 BENIGNO DIZON SANGALANG  
10 CONNIE CUARESMA SANGALANG

Case No: 15-cv-04752-RS

11 Plaintiffs,  
12 vs.

ORDER  
STIPULATION TO EXTEND  
DATE FOR FILING  
AMENDED COMPLAINT

13 BANK OF AMERICA N.A AND PRLAP  
14 INC. AND M&T BANK by BAYVIEW  
15 LOAN SERVICES LLC  
16 ("BAYVIEW LOAN SERVICES LLC")  
17 and LAW OFFICES OF LES ZIEVE  
18 ("LAW OFFICES OF LES ZIEVE")  
19 AS TRUSTEE; FIRST AMERICAN TITLE  
20 INSURANCE COMPANY, A CALIFORNIA  
21 CORPORATION; ALL PERSONS UNKNOWN  
CLAIMING ANY LEGAL OR EQUITABLE  
RIGHT, TITLE, ESTATE, LIEN OR INTEREST  
IN THE PROPERTY DESCRIBED IN THE  
COMPLAINT ADVERSE TO PLAINTIFF'S  
TITLE, OR ANY CLOUD ON PLAINTIFF'S  
TITLE THERETO, AND DOES 1 - 10,

22 Defendants  
23 \_\_\_\_\_/

24 This Stipulation and Agreement to extend the January 27, 2016, deadline for Plaintiffs  
25 to file a First Amended Complaint is hereby entered into between Defendants, Law Offices of  
26  
27  
28

1 Les Zieve, Bayview Loan Services LLC, and First American Title Insurance Company, a  
 2 California Corporation (all Defendants who have appeared thus far in the within action).  
 3

#### 4 RECITALS

5 **WHEREAS**, Plaintiffs filed this action on October 14, 2015 in the United States  
 6 Federal Court, Northern District of California (Case No. 15-cv-04752-RS) alleging causes of  
 7 action for: 1) Violation First Security Rule, 2) Breach of Oral Contract, 3) Breach of Written  
 8 Contract, 4) Wrongful Foreclosure, 5) Quiet Title, 6) Slander of Title, 7) Cancellation of  
 9 Instruments, 8) Promissory Estoppel, 9) Negligence, 10) Negligent Misrepresentation, 11)  
 10 Fraud, 12) Violation of the Rosenthal Fair Debt Collection Practices, 13) Unfair Business  
 11 Practices Under B&P Code Section 17200 et seq, and 14) Declaratory Relief.  
 12

13 **WHEREAS**, on January 7, 2016, the Court granted Plaintiffs leave to file an  
 14 Amended Complaint and Plaintiffs were to amend the Complaint within twenty (20) days of  
 15 the date of the Order.

16 **WHEREAS**, Plaintiffs through their counsel William F. Marini are desirous of an  
 17 extension of time to complete said lengthy Amended Complaint until and through February 7,  
 18 2016 (ten days).  
 19

#### 20 **STIPULATION**

#### 21 **COMES NOW THE PARTIES AND HEREBY STIPULATE AS FOLLOWS:**

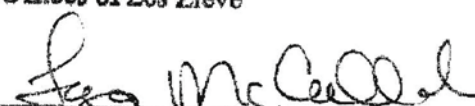
22 All parties by and through their attorneys of record, whom have appeared thus far,  
 23 stipulate that the deadline to file the Amended Complaint shall be extended until and through  
 24 February 7, 2016.  
 25  
 26  
 27  
 28

1 This Stipulation may be executed in counterpart, each of which will be considered an  
2 original, but all of which together will constitute the same instrument, in order to expedite. A  
3 fax copy shall be sufficient to lodge with the Court.  
4

5 Dated: \_\_\_\_\_  
6

Tanya McCullah, Esq.  
Attorney for Defendant, Law  
Offices of Les Zieve


7  
8  
9 Dated: 1/26/2016  
10

  
Tanya McCullah, Esq.  
Attorney for Defendant, Bayview  
Loan Services LLC  
11  
12

13 Dated: \_\_\_\_\_  
14

L. Bryant Jaquez, Esq.  
Attorney for Defendant  
First American Title Insurance  
Company  
15  
16

17 Dated: 1-27-2016  
18

  
William F. Marini, Esq.  
Attorney for Plaintiffs  
19  
20

21 PURSUANT TO STIPULATION,  
22 IT IS SO ORDERED.  
23

24 Dated: \_\_\_\_\_  
25  
26  
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28

\_\_\_\_\_  
Judge of the U.S. District Court

01/26/2016 17:05 5103522901

SD COUNTY LAW

PAGE 04

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 4

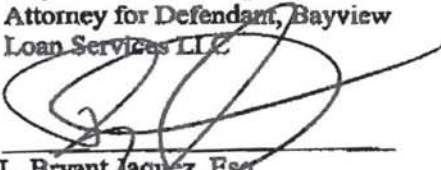
5 Dated: \_\_\_\_\_  
 6

Tanya McCullah, Esq.  
 Attorney for Defendant, Law  
 Offices of Les Zieve

7 Dated: \_\_\_\_\_  
 8

Tanya McCullah, Esq.  
 Attorney for Defendant, Bayview  
 Loan Services LLC

9 Dated: 1/27/16  
 10

  
 L. Bryant Jaquez, Esq.  
 Attorney for Defendant  
 First American Title Insurance  
 Company

11 Dated: \_\_\_\_\_  
 12

William F. Marini, Esq.  
 Attorney for Plaintiffs

13 PURSUANT TO STIPULATION,  
 14

15 IT IS SO ORDERED.  
 16

17 Dated: 1/28/16  
 18

  
 Judge of the U.S. District Court

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Stipulation and Agreement to Extend Time to File  
 Plaintiffs' Amended Complaint